

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	
Amateur Radio Service Rules to Eliminate)	RM - 10786
Morse Code Proficiency Testing Requirements)	
For All Classes of Amateur Licenses)	
)	
To: The Commission)	

Comments Of C. Kurt Alexander, MD WB9USA

Dear Commission Members:

I am an amateur radio operator. I was originally licensed in 1976. I have taken exams when it was still required to take them in the presence of an FCC official, by appointment only. There were no study guides then with all the questions and answers. I scratched and crawled my way to the top, and yes, I passed the 20 word per minute requirement for my extra class license.

My how times have changed!

And for the better, I might add. Now, I can find a testing center just about any weekend within driving distance. I can have instant upgrades upon successfully passing my exam. I no longer would have to pass a 20 wpm code test. I feel the pressing need for a change again—the need to eliminate entirely the Morse code requirement.

First of all, Morse code is a mode of transmission that is archaic. There are much more efficient means of communication, namely digital, that can result in 100 percent perfect transmissions in band conditions that would make it very hard, if not impossible, for even a highly trained Morse code operator to hear anything. Certainly the digital speeds would exceed anything that a typical Morse code operator could do.

Second, it is just a mode, like FM, AM, single side band, packet, slow scan TV. I do not think it should be awarded any special status over any of the other modes of communication available to the amateur radio community. Being able to do Morse code does not mean that you are smarter, or more likely to follow the rules. It does not make you a more valuable radio operator, because, quite frankly, nobody cares. CW is outmoded and no one uses it for any meaningful communication any longer. Our emergency communication center in our county has no use for Morse code, but they DO like having trained radio operators who are proficient at verbal communication and who can operate digital communications gear. To my fellow operators who enjoy Morse code, I say that is great! One of the best things about amateur radio (and the USA for that matter) is the freedom to pursue

what interests oneself. I hope they continue to use it. But, I ask the Commission to issue an expedited order removing the Morse code requirement for amateur radio operator licensing.

Third, amateur radio has a long standing history at being on the cutting edge of communication technology. Single side band, FM, packet, TV are some of the examples that I can think of where amateur radio has played an integral role in the formation of new modes of communication. For that reason, it strikes me as ridiculous how some people try to hang on fastidiously to the outdated Morse code requirement. It no longer contributes to the art of radio communication. If anything, it is a hindrance. It is very hard to interest today's youth in learning to become a ham radio operator once they learn of the Morse code requirement. If we can't attract youngsters to the amateur radio service, eventually the whole thing will just die out.

Fourth, the recent changes in the WRC-2003 Conference make it possible for the FCC to eliminate this onerous requirement. It is my understanding that the Commission has looked at the Morse code requirement extensively, as recently as 1998 when they were considering lowering the Morse code requirement to 5 wpm. At that time, it was noted by the Commission that it was in the best interest of the public to lower the requirement by reducing the Morse telegraphy examination to the minimum that meets ITU regulations. With the recent changes, ITU no longer requires any Morse test at all for any class of amateur radio operator.

Fifth, other countries have already adopted the new rules that eliminate Morse code requirements. Switzerland, United Kingdom, Belgium, Germany, and Norway have already eliminated the requirement for their citizens. I see no reason for our citizens not to benefit from a like decision.

Sixth, I said it earlier, but I would really like to urge you to give this proposal an expedited review and order. It has, in essence, already been considered by the Commission previously. The ONLY reason it was kept at all, was because the ITU regulations required it. They no longer require it, and neither should we. Please resist the temptation to lump this in with other rule making procedures. Band plans, license classes, and operator privileges are substantially unrelated and if grouped together with the elimination of the Morse code requirement, would result in a long delay for what appears to be a clear-cut decision.

Finally, I just would like to say thank you for allowing me to be an amateur radio operator. I have learned a lot about electronics and wiring. I can fix my own radios and computers. I can change the wiring in my house. I have coaxed and cajoled my two sons, my wife and my father in to being licensed. I can go to amateur radio conventions with my ham friends from various other walks of life and completely forget that I am a physician. It has been fun. I hope that the Commission will see fit to modernize the requirements so we can attract the younger generation people into our ranks. I want to share my fun with those that have been put off by the Morse code requirement. I hope you will make it possible for me to do so.

Respectfully submitted,

C. Kurt Alexander, MD WB9USA
PO BOX 536
Yorktown, IN 47396
WB9USA@arrl.net